

Remarks

As stated above, Applicants appreciate the Examiner's thorough examination of the subject application and request reexamination and reconsideration of the subject application in view of the preceding amendments and the following remarks.

As of the Final Office Action of August 9, 2010 claims 1-20 were pending in the subject application, of which claims 1 and 11 are independent claims. With this response Applicants have amended claims 1-3, 5-6, 9-14, 16-17, and 20 and have added new claims 21-22. No new matter is believed to have been added as a result of these amendments.

Examiner Interview

As an initial matter, Applicants would like to thank the examiner for the interview conducted on September 27, 2010. During the interview the differences between the Raveis reference and the subject application were generally discussed. No formal agreement was reached.

Claim Rejections - 35 U.S.C. § 102

Claims 1-20 are rejected under 35 U.S.C. 102(b) as anticipated by Raveis, Jr., (U.S. Patent No. 6,321,202, hereinafter "Raveis").

Claim 1 stands rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,321,202 issued to Raveis. Applicants respectfully traverse this rejection.

As discussed during the telephonic interview, Applicants respectfully submit that the subject matter of the Raveis reference is entirely different from the subject matter of the present application. Specifically, it is Applicants' understanding that Raveis is directed towards a method for managing transactions relating to real estate. *See, Raveis, Title*. As stated by the Examiner on pages 3-4 of the Official Action dated August 9, 2010, Raveis is directed towards

connecting real estate agents with real estate sales listings. *See, Official Action, page 4.* In

Raveis, the target is always a real estate listing, e.g., an MLS listing for a home, apartment, etc.

This differs significantly from Applicants' newly amended claim 1, which is provided below for the Examiner's convenience.

1. (Currently Amended) A computer-implemented method of determining a pathway between a source connection point and a target connection point comprising:
 providing a computer system having at least one database comprising data defining individuals, business entities, or both as connection points;
 defining the source connection point as a list of contacts comprising individuals, business entities, or both;
 defining the target connection point, wherein the target connection point is at least one individual, business entity, or both; and
 defining a set of intermediate connection points as a series of intermediate contacts that collectively define the pathway from the source connection point to the target connection point, as a function of predetermined relationships among a superset of contacts comprising the intermediate contacts.

Support for Applicants' newly amended claim 1 may be found throughout the subject application, for example, in Figures 5-21 and the accompanying discussion in the specification. As shown above, Applicants' newly amended claim 1 recites, in part, "defining the target connection point, wherein the target connection point is at least one individual, business entity, or both". *See, Applicants' claim 1.* In other words, Applicants' claim 1 provides a pathway between people or businesses to other people or businesses. *See, e.g., Figure 9 of the present application, which shows a connection from a person to a business entity (Exxon).*

In contrast, Raveis appears to teach connecting people (real estate agents) with real estate listings (homes for sale). It is Applicants' understanding that the target in Raveis is always a

listing for real estate. Applicants respectfully submit that a real estate sales listing is neither an individual, a business entity, or both as required by Applicants' claim 1.

Further, Applicants remind the Examiner that the claims of an application must be read in light of the specification. Applicants respectfully contend that the meaning of the term "business entity" may be easily ascertained upon a cursory review of the specification, e.g., Figures 9, 14, etc. Applicants respectfully submit that to equate a real estate listing with a business entity (e.g. Exxon in Figure 9) would be interpreting the claims in a manner outside that which has been set forth by Applicants in the specification. *See, MPEP §2111* ("claims must "given their broadest reasonable interpretation consistent with the specification"). *Emphasis Added.*

Therefore, Applicants respectfully submit that Raveis fails to disclose each and every limitation of Applicants' newly amended claim 1. As such, Applicants respectfully submit that newly amended claim 1 is in condition for allowance. Applicants note that newly added independent claims 11 has been drafted to include similar limitations to that of claim 1 and respectfully submit that claim 11 is in condition for allowance as well. Since dependent claims 2-10 and 12-20 depend, either directly or indirectly, from Applicants' independent claims 1 and 11, Applicants respectfully submit that these claims are in condition for allowance as well. Accordingly, withdrawal of the rejection to claim 1 under 35 U.S.C. § 102 is respectfully requested and an indication of allowability of claims 1-20 is earnestly solicited.

Moreover, Applicants have also added new claims 21-22. These claims are also provided below for the Examiner's convenience.

21. (New) A computer-implemented method of determining a pathway between a source connection point and a target connection point comprising:

providing a computer system having at least one database comprising data defining individuals as connection points;

- defining the source connection point as a list of contacts comprising individuals;
- defining the target connection point, wherein the target connection point is at least one individual; and
- defining a set of intermediate connection points as a series of intermediate contacts that collectively define the pathway from the source connection point to the target connection point, as a function of predetermined relationships among a superset of contacts comprising the intermediate contacts.

22. (New) A computer-readable storage medium having stored thereon instructions for determining at least one pathway between a source connection point and a target connection point, said instructions when executed by a computer causes a processor to perform operations comprising:

- defining the source connection point as a list of contacts comprising individuals;
- defining the target connection point, wherein the target connection point is at least one individual; and
- defining a set of intermediate connection points as a series of intermediate contacts that collectively define the pathway from the source connection point to the target connection point, as a function of predetermined relationships among a superset of contacts comprising the intermediate contacts.

In light of the above discussion, Applicants respectfully submit that these claims are in condition for allowance as well.

Having overcome all of the outstanding rejections, Applicants respectfully submit that the subject application is now in condition for allowance. Applicants believe that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper.

In consideration of the amendments and foregoing discussion, the application is now believed to be in condition for allowance. Early allowance of the subject application is respectfully solicited. The Examiner is kindly invited to contact Applicants' attorney at 617-854-1460 to facilitate prosecution.

This response should not require any additional fees. However, in the event that additional fees are due, please charge or credit any refund to our Deposit Account No. 50-2324.

Respectfully Submitted,

Dated: November 2, 2010

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